



STATE OF LOUISIANA  
DEPARTMENT OF STATE CIVIL SERVICE  
**LOUISIANA BOARD OF ETHICS**  
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Thursday, August 19, 2021

Randy Sexton  
Board for the North Webster Parish  
Industrial District  
489 Cowboy Morgan Road  
Shongaloo, Louisiana 71072

**Re: Louisiana Board of Ethics**  
**Docket No. 2021-538**

Dear Mr. Sexton:

The Louisiana Board of Ethics ("Board"), at its September 3, 2021 meeting, considered your request for an advisory opinion as to whether the Louisiana Code of Governmental Ethics ("Code") would prohibit the North Webster Parish Industrial District ("NWPID") from accepting a bid.

**FACTS PROVIDED**

You serve as the Chairman of the Board for the NWPID, which is a seven-member board that oversees a relatively small industrial park. The NWPID is a public board, whose members are not compensated for their public service.

One of the park tenants requested that the NWPID make floor repairs on property owned by the NWPID, repairs for which the NWPID is responsible for making in accordance with the lease. The cost of the repairs is less than \$250,000.00. The NWPID contacted a retired engineer, who prepared plans and specifications on the scope of repair work.

3-D Contracting Corp., is a tenant of the NWPID Industrial Park and an Arkansas (non-Louisiana) corporation that is owned and operated Ronald E. Dees and Barbara E. Dees ("Mr. Dees"). Mr. Dees is also an alderman for District No. 5 for the City of Springhill. The City of Springhill is the largest community represented on the NWPID Board. The Mayor of the City of Springhill nominates two (2) members on the NWPID Board and the City of Springhill Council votes on those nominations.

**LAW**

**La. R.S. 42:1102(16)** defines "person" to mean an individual or legal entity other than a governmental entity, or an agency thereof.

## **CONCLUSION**

The Board concluded, and instructed me to inform you, that based on the facts presented, the Code does not prohibit the NWPID from accepting the bid submitted by 3-D Contracting Corp. The NWPID is not a person and, thus, is not capable of violating the Code.

This advisory opinion is based solely on the facts as set forth herein. Changes to the facts as presented may result in a different application of the provisions of the Louisiana Code of Governmental Ethics. The Board issues no opinion as to past conduct or as to laws other than the Louisiana Code of Governmental Ethics, the Campaign Finance Disclosure Act, the Lobbyist Disclosure Act, and the conflict of interest provisions contained in the Louisiana Gaming Control Law. If you have any questions, please contact me at (800) 842-6630 or (225) 219-5600.

Sincerely,

**LOUISIANA BOARD OF ETHICS**

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LaToya D. Jordan  
For the Board

**DISCLAIMER**  
This is a draft opinion and it is **NOT** an opinion of the Louisiana Board of Ethics.  
No party may rely on the facts or conclusions. The analysis and conclusions herein are provided for discussion purposes only, and are subject to change or revision at the meeting of the Board of Ethics at which this matter is considered.